

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

CASE NO.: 1:22-cv-21004-MD

**JESSICA GUASTO,**

Plaintiff,

vs.

**THE CITY OF MIAMI BEACH, FL,**  
a Florida municipality,

Defendant.

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**DEFENDANT’S UNOPPOSED MOTION FOR EXTENSION OF TIME  
TO FILE ITS BILL OF COSTS AND SUPPORTING MEMORANDUM**

Defendant, THE CITY OF MIAMI BEACH, FL, (the “City”), through its counsel files its Unopposed Motion for Extension of Time to File Its Bill of Costs and Supporting Memorandum and in support states the following:

1. On February 21, 2025, this Court entered its Order on Defendant’s Motion for Summary Judgment [DE 108] granting summary judgment in favor of the City.
2. On February 24, 2025, this Court entered Final Judgment in favor of the City [DE 109, 110].
3. Accordingly, pursuant to Southern District of Florida Local Rule 7.3(c), the City’s Bill of Costs and supporting memorandum is due on or before March 26, 2025.
4. The City respectfully requests an extension of time of ten (10) days to file its Bill of Costs and supporting memorandum, making everything due on or before Monday, April 7, 2025.
5. Good cause exists for granting this extension.

6. Specifically, pursuant to Southern District of Florida Local Rule 7.1(a)(3), the Parties are continuing to confer in good faith to resolve the items of costs being sought.

7. To that end, the City is hopeful to either resolve the need for filing a Bill of Costs all together or at least limit the cost items for which there is disagreement.

8. Additionally, undersigned certifies that he conferred with Plaintiff's counsel and there is no objection to the relief sought herein.

9. The City certifies that this Motion is made in good faith and not for purposes of delay.

10. Granting this Motion will not impact any other deadlines.

WHEREFORE, the City respectfully requests that the Court grant this Motion and set the deadline for the City to file its Bill of Costs and supporting memorandum as April 7, 2025.

Dated: March 23, 2025.

Respectfully submitted,

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*Co-Counsel for Defendant*

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on March 23, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

*s/Michael L. Elkins*  
Michael L. Elkins

**SERVICE LIST**

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